The State of Utah

Department of Natural Resources

Division of Oil, Gas & Mining

ROBERT L. MORGAN
*Executive Director*

LOWELL P. BRAXTON
*Division Director*

OLENE S. WALKER
*Governor*

GAYLE F. McKEACHNIE
*Lieutenant Governor*

# Inspection Report

| Representatives Present During the Inspection: | |
|---|---|
| Company | Scott Dimick Superintendent |
| OGM | Pete Hess Environmental Scientist III |

| | |
|---|---|
| Permit Number: | C0070033 |
| Inspection Type: | PARTIAL |
| Inspection Date: | Thursday, September 09, 2004 |
| Start Date/Time: | 9/9/2004 9:00:00 AM |
| End Date/Time: | 9/9/2004 11:15:00 AM |
| Last Inspection: | Tuesday, August 17, 2004 |

Inspector: Pete Hess, Environmental Scientist III

Weather: Sunny, clear and coool; 60's Fahrenheit

InspectionID Report Number: 395

Accepted by: whedberg
9/22/2004

Permitee: **ANDALEX RESOURCES INC TOWER DIVISION**
Operator: **ANDALEX RESOURCES INC TOWER DIVISION**
Site: **WILDCAT LOADOUT**
Address: **PO BOX 902, PRICE UT 84501**
County: **CARBON**
Permit Type: **PERMANENT COAL PROGRAM**
Permit Status: **ACTIVE**

**Current Acreages**

| | |
|---|---|
| 100.00 | **Total Permitted** |
| 63.70 | **Total Disturbed** |
| | **Phase I** |
| | **Phase II** |
| | **Phase III** |

**Mineral Ownership**

- [x] **Federal**
- [ ] **State**
- [ ] **County**
- [ ] **Fee**
- [ ] **Other**

**Types of Operations**

- [ ] **Underground**
- [ ] **Surface**
- [x] **Loadout**
- [x] **Processing**
- [ ] **Reprocessing**

**Report summary and status for pending enforcement actions, permit conditions, Division Orders, and amendments:**

The only special permit condition which exists in Attachment "A" of the current State permit is the requirement that the permittee submit quarterly surface water monitoring information to the Division web site in an electronic format. The permittee continues to meet this permit requirement, having submitted the first quarter of 2004 surface water monitoring information for the Wildcat Loadout on May 25, 2004. The information included UPDES monitoring information for the sites six sediment pond outfalls.

**Inspector's Signature** Pete Hess **Date** Thursday, September 09, 2004

Pete Hess, Environmental Scientist III
Inspector ID Number: 46

**Note:** This inspection report does not constitute an affidavit of compliance with the regulatory program of the Division of Oil, Gas and Mining.

***REVIEW OF PERMIT, PERFORMANCE STANDARDS PERMIT CONDITION REQUIREMENTS***

1. *Substantiate the elements on this inspection by checking the appropriate performance standard.*
   a. *For COMPLETE inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check Not Applicable.*
   b. *For PARTIAL inspections check only the elements evaluated.*
2. *Document any noncompliance situation by reference the NOV issued at the appropriate performance standard listed below.*
3. *Reference any narratives written in conjunction with this inspection at the appropriate performace standard listed below.*
4. *Provide a brief status report for all pending enforcement actions, permit conditions, Divison Orders, and amendments.*

| | Evaluated | Not Applicable | Comment | Enforcement |
|---|---|---|---|---|
| 1. Permits, Change, Transfer, Renewal, Sale | ☐ | ☐ | ☐ | ☐ |
| 2. Signs and Markers | ☑ | ☐ | ☐ | ☐ |
| 3. Topsoil | ☑ | ☐ | ☑ | ☐ |
| 4.a Hydrologic Balance: Diversions | ☑ | ☐ | ☑ | ☐ |
| 4.b Hydrologic Balance: Sediment Ponds and Impoundments | ☑ | ☐ | ☑ | ☐ |
| 4.c Hydrologic Balance: Other Sediment Control Measures | ☑ | ☐ | ☐ | ☐ |
| 4.d Hydrologic Balance: Water Monitoring | ☑ | ☐ | ☑ | ☐ |
| 4.e Hydrologic Balance: Effluent Limitations | ☐ | ☐ | ☐ | ☐ |
| 5. Explosives | ☐ | ☐ | ☐ | ☐ |
| 6. Disposal of Excess Spoil, Fills, Benches | ☐ | ☑ | ☐ | ☐ |
| 7. Coal Mine Waste, Refuse Piles, Impoundments | ☑ | ☐ | ☑ | ☐ |
| 8. Noncoal Waste | ☑ | ☐ | ☐ | ☐ |
| 9. Protection of Fish, Wildlife and Related Environmental Issues | ☐ | ☐ | ☐ | ☐ |
| 10. Slides and Other Damage | ☐ | ☑ | ☐ | ☐ |
| 11. Contemporaneous Reclamation | ☐ | ☑ | ☐ | ☐ |
| 12. Backfilling And Grading | ☐ | ☑ | ☐ | ☐ |
| 13. Revegetation | ☐ | ☑ | ☐ | ☐ |
| 14. Subsidence Control | ☐ | ☑ | ☐ | ☐ |
| 15. Cessation of Operations | ☐ | ☐ | ☐ | ☐ |
| 16.a Roads: Construction, Maintenance, Surfacing | ☑ | ☐ | ☑ | ☐ |
| 16.b Roads: Drainage Controls | ☑ | ☐ | ☐ | ☐ |
| 17. Other Transportation Facilities | ☐ | ☐ | ☐ | ☐ |
| 18. Support Facilities, Utility Installations | ☑ | ☐ | ☐ | ☐ |
| 19. AVS Check | ☐ | ☐ | ☐ | ☐ |
| 20. Air Quality Permit | ☑ | ☐ | ☑ | ☐ |
| 21. Bonding and Insurance | ☐ | ☐ | ☐ | ☐ |
| 22. Other | ☐ | ☐ | ☐ | ☐ |

**3. Topsoil**

The topsoil pile located east of sediment pond "A" was inspected this day. The pile is covered with a protective layer of vegetation, although much of the vegetation consists of weeds. Grasses have flourished here in the past, when adequate moisture was available. The soil surface of the pile is smooth, allowing much of any intercepted moisture to report to the containment berm surrounding 80% of the piles perimeter. Coal fine presence appeared to be negligible. The Division recommends that soil storage piles be roughened or "pocked" to enhance moisture retention and promote revegetation.

**4.a Hydrologic Balance: Diversions**

The twelve-inch corrugated metal pipe designated as C-38 (See PLATE 1, Wildcat Loadout Surface Facilities As Constructed) which is located directly south of pond "C" was observed to have 50% of the cross-sectional area of the discharge end blocked with coal fines. The receiving ditch was also partially blocked with fines to the extent that ditches D-8 and D-9 need redefinement. Mr. Dimick agreed to perform the necessary maintenance. The discharge end of C-38 lies right in the junction where D-8 and D-9 join. Hense, as the ditches silt in, the culvert discharge end becomes obstructed. Mr. Dimick suggested that the permittee be allowed to shorten the discharge end of this culvert, to help in keeping the outlet free of silt buildup. This was agreed upon.

**4.b Hydrologic Balance: Sediment Ponds and Impoundments**

Ponds "A" through "F" were inspected this day, and found to be dry. There were no compliance issues noted.

**4.d Hydrologic Balance: Water Monitoring**

Wildcat Wash was observed to have extensive weed growth in the channel. There was no flow evident.

**7. Coal Mine Waste, Refuse Piles, Impoundments**

The coal mine waste pile was inspected and observed to have several piles of dirt intermingled with straw. The straw is from the bales that are placed about the site for sediment control. It was pointed out to Mr. Dimick that straw is a noncoal waste item which should not be disposed of on the waste rock site in accordance with R645-301-528.333. Straw has a lower ignition temperature than coal waste; the elimination of a potential fire source is the justification behind the removal of the straw from the wasterock pile. The permittee was instructed to remove the straw from the piles and dispose of it at the County landfill. There were no other problems noted with the waste rock pile.

**16.a Roads: Construction, Maintenance, Surfacing**

The road surface of primary road PR-5, which is located east of pond "C", consisted of very fine dry powder. Mr. Dimick indicated that this is a "Cat" road which is very seldom used by coal trucks. It was suggested that in lieu of heavy watering (when the road is needed) that the fines be bladed off. A layer of gravel might possibly reduce the amount of fines being thrown into suspension when this road is traveled.

**20. Air Quality Permit**

Many of the haul roads being utilized by trucks at the site were in a compacted, moist condition. An application of water had been made prior to today's inspection. Fines were observed being thrown into suspension where the coal trucks were crossing the coal storage pads, and where front end loaders were bucket loading coal trailers.